IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Virginia

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Criminal No. 1:18 CR 83

The Honorable T.S. Ellis, III

Defendant.

STIPULATION REGARDING \$500,000 WIRE

The parties stipulate to the following facts:

- 1. Marc Baldinger previously owned Aegis Holdings, LLC, which provided investment advice.
- 2. In 2013, Paul J. Manafort, Jr., through an entity he controlled named LilRed, LLC, made various investments through Aegis Holdings, LLC, totaling approximately \$1,500,000.
- 3. On September 4, 2013, at 10:43 AM, Marc Baldinger sent an email to Mr. Manafort inquiring about a \$500,000 payment noting: "Please let me know when you have attempted to wire the funds and I will look out for it." Mr. Manafort sent an email in response on September 4, 2013, at 10:44 AM, and noted, "they should be in your account today. Coming from global endeavor LTD."
- 4. On September 3, 2013, \$500,000 was transferred from Global Endeavour Inc.'s bank account at Loyal Bank in Kingstown, Saint Vincent and the Grenadines, to an account of Aegis Holdings, LLC.

5. The record attached as Exhibit A hereto is a record of Aegis Holdings, LLC, and constitutes a record of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of Evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

We ask for this:

Special Counsel

Paul J. Manafort, Jr.,

Defendant

By: By

Kevin Downing, Esq. Tom Zehnle, Esq.

Jay Nanavati, Esq.

Counsel for Defendant

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